NEW MEXICO
ENVIRONMENT DEPARTMENT

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Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

Certified Mail – Return Receipt Requested

August 29, 2019

Mr. Dan Campbell
General Manager, Raton Water Works
P.O. Box 99
Raton, New Mexico 87740

Re: Raton Wastewater Treatment Plant; Minor Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES #NM0020273; August 20, 2019

Dear Mr. Campbell:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report. Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
Environmental Protection Agency,
Region 6 Water Enforcement Branch (6ECDWM)
1201 Elm Street, Suite 500
Dallas, Texas 75202

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6ECDWM) by e-mail
David Long, USEPA (6ECDWM) by e-mail
Nancy Williams, USEPA (6ECDWA) by e-mail
Amy Andrews, USEPA (6ECDWM) by e-mail
David Esparza, USEPA (6ECDWM) by e-mail
Brent Larsen USEPA (6WDPE) by e-mail
Robert Italiano, NMED District II by e-mail
Dan Campbell, City of Raton by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	NM0002027	3		190820			C		S		1

Remarks: MINOR MUNICIPAL LWWTP

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				4		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
RATON WASTEWATER TREATMENT PLANT; I-25 NORTH TO EXIT 450 INTO RATON. CONTINUE, TURNING RIGHT ON HEREFORD RD. DRIVE PAST THE STATE POLICE STATION INTO WWTP COLFAX COUNTY	10:00am 8-20-19	**July 1, 2015**
	Exit Time/Date	Permit Expiration Date
	3:00pm 8-20-19	**June 30, 2020**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Mr. Lloyd Wakefield, Wastewater Superintendent (575) 445-2292 Mr. Dan Campbell, General Manager (575) 445-3860	**LAT N. 36° 52'13.91"** **LONG W. -104° 25"39.18'**
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Dan Campbell, General Manager (575) 445-3860 P.O. Box 99, Raton, NM 87740	Contacted Yes [x] No [ ]
	SIC 4952

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	**Permit**	**S**	**Flow Measurement**	**S**	**Operations & Maintenance**	**N**	**CSO/SSO**
S	**Records/Reports**	**S**	**Self-Monitoring Program**	**S**	**Sludge Handling/Disposal**	**N**	**Pollution Prevention**
S	**Facility Site Review**	**S**	**Compliance Schedules**	**N**	**Pretreatment**	**N**	**Multimedia**
S	**Effluent/Receiving Waters**	**S**	**Laboratory**	**N**	**Storm Water**	**N**	**Other:**

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jennifer Foote */s/ Jennifer Foote*	**NMED/SWQB 505-827-0596**	**8/29/19**
Signature of Management QA Reviewer **Sarah Holcomb, Program Manager** */s/ Sarah Holcomb*	**Agency/Office/Phone and Fax Numbers** **NMED/SWQB 505-827-2798**	**Date** **8/29/19**

Raton WWTP	DATE 8/20/19	PERMIT NO. NM0020273

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED No*)

DETAILS: **Permit expires June 30, 2020, reapplication is due 6 months prior.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED Yes*)

DETAILS:.

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒ Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☒ S ☐ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☒ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☒ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☒ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☒ Y ☐ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☒ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☒ S ☐ M ☐ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR	☒ S ☐ M ☐ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☒ Y ☐ N ☐ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED No*)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☒ S ☐ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☒ Y ☐ N ☐ NA

Raton WWTP	DATE 8/20/19	PERMIT NO. NM0020273

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐ Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☒ Y ☐ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☒ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☒ Y ☐ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☒ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☒ Y ☐ N ☐ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE 6" parshall w ultrasonic meter	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☒ Y ☐ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE. *(DATE OF LAST CALIBRATION* 10-2-2018)	☒ Y ☐ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☒ Y ☐ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☒ Y ☐ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☒ Y ☐ N ☐ NA
6. HEAD MEASURED AT PROPER LOCATION.	☒ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No)*
DETAILS: TRC, pH, BOD, TSS performed at facility

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☒ Y ☐ N ☐ NA

Raton WWTP	DATE 8/20/19	PERMIT NO. NM0020273

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ S ☐ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☒ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME. ☒ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. ☒ Y ☐ N ☐ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

Seacrest Group
1341 Cannon St. Louisville, CO 80027-1455

Hall Environmental
4901 Hawkins NE, Albuquerque, NM 87109

PARAMETERS PERFORMED Whole Effluent Toxicity Nitrogen & Phosphorus

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	n/a	n/a	n/a	n/a	n/a	n/a	n/a

RECEIVING WATER OBSERVATIONS No discharge at time of inspection, outfall area looked clean.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED No).*
DETAILS: Land Disposal on city owned land adjacent to WWTP

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☒ S ☐ M ☐ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED ___).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Further Explanations
Raton Wastewater Treatment Plant
Compliance Evaluation Inspection
NPDES Permit No. NM0020273
Inspection Date: August 20, 2019

INTRODUCTION:
On August 20 2019, Jennifer Foote of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB), accompanied by Amy Andrews of the U.S. Environmental Protection Agency (USEPA) conducted a Compliance Evaluation Inspection at the Raton Wastewater Treatment Plant (WWTP). The Raton WWTP has a design flow capacity of 0.9 million gallons per day (MGD) and is classified as a minor discharger under the Federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0020273. This permit regulates the WWTP discharge to Doggett Creek, an unclassified perennial tributary of the Canadian River Basin in Segment 20.6.4.99 according to the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC. This segment includes the designated uses of livestock watering, wildlife habitat, Warmwater aquatic life, and primary contact.

A TMDL for nutrients was approved by the NMWQCC August 14, 2019 and is being sent to EPA for approval. A temporary standard for nutrients is planned to be proposed in October 2019. A temporary standard is appropriate in this case due to the robust treatment needed to comply with the technologically unachievable water quality standard for nutrients. This allows the community to investigate pollution control options and continually improve water quality without onerous financial obligations to install expensive treatment technology. Once the temporary standard is approved in accordance with 40 CFR Part 131.14(c), the variance (or "temporary standard" under 20.6.4.F NMAC) is the applicable water quality standard for the term of the variance. This will govern permitting requirements when this permit is reissued, and supercedes any TMDL that is in place.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

INSPECTION DETAILS:
Upon arrival at the WWTP at 10 am on the day of this inspection, the inspector made introductions, presented her credentials, and explained the purpose of the inspection to Mr. Dan Campbell, General Manager, and Mr. Lloyd Wakefield, Chief Plant Operator. We conducted a tour of the facility, including the laboratory and records kept onsite. An exit interview was conducted with Mr. Campbell and Mr. Wakefield at the facility at approximately 2:30pm to present the preliminary findings of the inspection.

TREATMENT SCHEME:
The Raton Wastewater Treatment Plant (WWTP) consists of the headworks including a screw pump/auger and grit removal, SBR basins and UV disinfection, as well as a reuse system. In the summer, about two thirds of the water goes to reuse. The facility was upgraded in 2007, the population of the area has not increased as projected at that time so there is plenty of capacity. There are no large industrial users in the area.

Influent enters the headworks through a 9" Parshall flume. Grits, solids, and rags are removed from the influent and collected in a container which is later disposed in a landfill. The flow then enters a splitter box where it is evenly divided between two basins of the Sequencing Batch Reactor (SBR). These two units run in parallel. The water enters equalization chambers after leaving the splitter box. This gives the operator control of the wastewater levels in the reactor basins. In the first phase, the water fills the reactor chambers. The water entering the chambers mixes with the biomass that has settled from the last treatment phase. Once the chambers are full, in the second phase, air is added to the mixture through fine bubble diffusers to facilitate biological growth and waste reduction/treatment

of the wastewater. In the third phase, the air is turned off and the treated wastewater is allowed to settle. In the decant phase, the now clarified effluent is discharged to the equalization basin. The total cycle run time can be changed to meet the needs of the facility.

Water is drawn from the equalization basin either on demand to the chlorination system and pumped out as reuse water, or automatically triggered by high level and sent to the Sunlight Systems UV treatment system and the outfall. The outfall discharge is also manually turned on each morning to allow sampling to occur at the flume during normal work hours. The enclosed UV system bulbs are periodically cleaned with an automatic internal scrubber. After disinfection by UV, the water proceeds to the outfall where it is measured by a 6" Parshall flume and totalizer meter.

The facility has two diesel generators to supply emergency power. The SCADA system includes an automatic call out system. Staff do two site visits a day to check on the facility on the weekends.

Septage:
The facility accepts septage only from within the county, the quantity varies from about 0-12,000 gallons per month. No grease is accepted. It is mixed directly into the sludge and then decants back to the headworks.

Sludge:
Waste sludge from the SBR basins is decanted during the idle phase and is directed to a holding basin on site. This was one of the former aeration basins from the old plant footprint. Sludge is then surface injected at an adjacent plot of land.

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of "Satisfactory "

Observations:

- Facility had a well maintained spare parts list
- Initial bench notes are made in a notebook and transferred to computer bench sheets which contain all the relevant information such as methods used. The notebooks are retained but do not include methods used.

Findings:

Permit Requirements ***Part III D.5. ADDITIONAL MONITORING BY THE PERMITTEE***

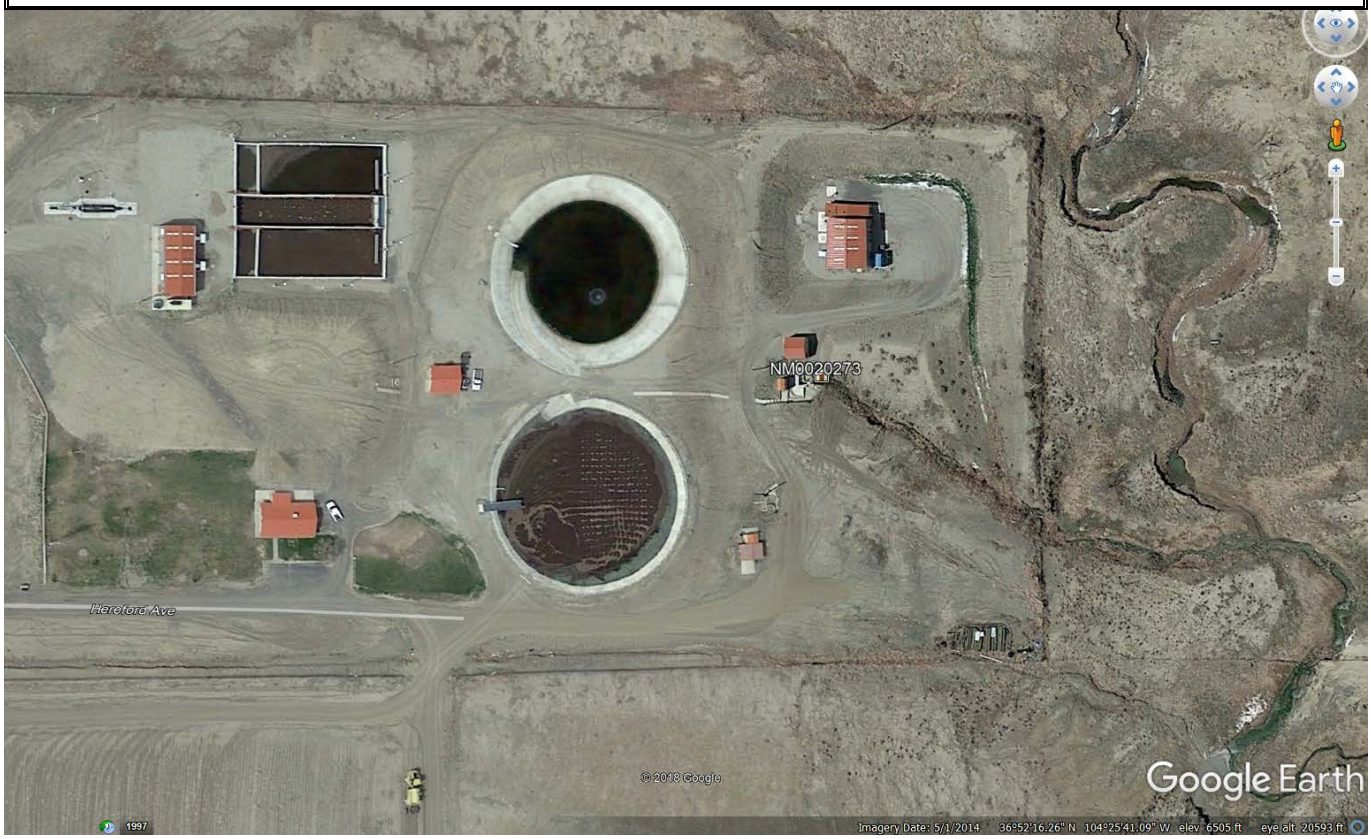
If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the Discharge Monitoring Report (DMR). Such increased monitoring frequency shall also be indicated on the DMR

Part IV Element 2 Section II, 4. b. Recordkeeping Requirements:

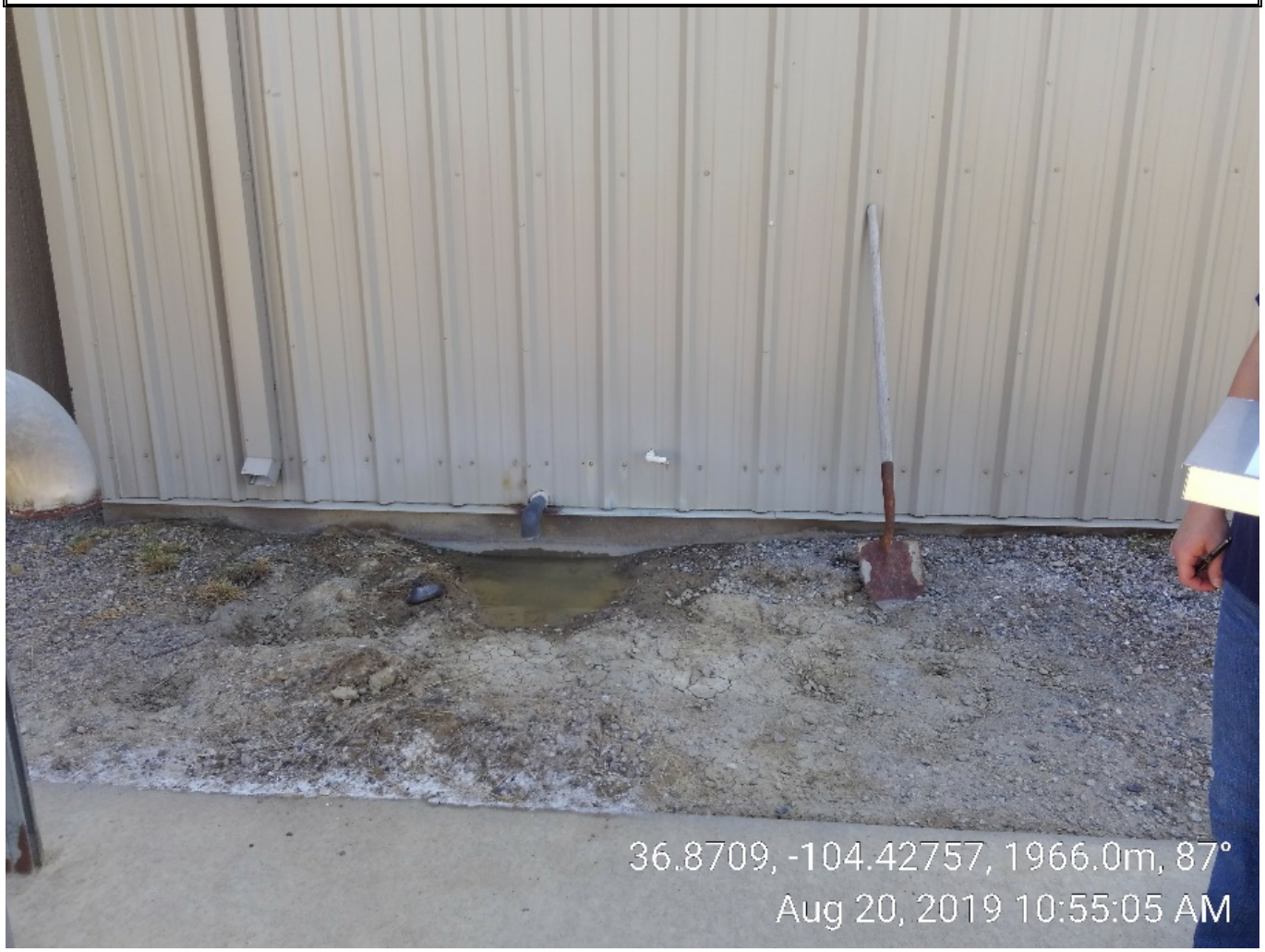
b. A certification statement that all applicable requirements (specifically listed) have been met, and that the permittee understands that there are significant penalties for false certification including fine and imprisonment. See 503.27(a)(1)(ii) or 503.27(a)(2)(ii) as applicable to the permittees sludge disposal activities.

- Facility performs their own process monitoring for Total Nitrogen(TN) and Total Phosphorous(TP). It appears that the TN method is not an EPA Approved Wastewater Methods listed in 40CFR136 and should not be reported. Currently, Hall Environmental performs the EPA approved methods for TN and TP that are reported. However, the TP test method used is Hach method 8190 which is equivalent to Standard Methods 4500-P and therefore the additional monitoring should be reported on DMRs.
- Sludge disposal records did not include the required Certification Statement.

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Google Earth	Date: 5-1-14	Time: unknown
City/County: Colfax County		State: New Mexico
Location: Raton Waste Water Treatment Plant		
Subject: aerial view of WWTP, sludge disposal in field to south		



NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Jennifer Foote	Date: 8-20-19	Time: 10:55 am
City/County: Colfax County		State: New Mexico
Location: Raton Waste Water Treatment Plant		
Subject: water softener discharge		



NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Jennifer Foote	Date: 8-20-19	Time: 10:27 am
City/County: Colfax County		State: New Mexico
Location: Raton Waste Water Treatment Plant		
Subject: treatment basins		

NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Jennifer Foote	Date: 8-20-19	Time: 10:48 am
City/County: Colfax County		State: New Mexico
Location: Raton Waste Water Treatment Plant		
Subject: outfall